

**BEFORE THE PUBLIC UTILITIES COMMISSION  
OF THE STATE OF CALIFORNIA**



**FILED**

11-30-06

04:59 PM

In the Matter of the Application of San Diego Gas & Electric Company and Southern California Gas Company for Authority to Integrate Their Gas Transmission Rates, Establish Firm Access Rights, and Provide Off-System Gas Transportation Services.

A.04-12-004 (Phase II)

**CITY OF LOS ANGELES DEPARTMENT OF WATER AND POWER  
NOTICE OF EX PARTE COMMUNICATION**

Norman A. Pedersen  
HANNA AND MORTON LLP  
444 South Flower Street, Suite 1500  
Los Angeles, California 90071-2916  
Telephone: (213) 430-2510  
Facsimile: (213) 623-3379  
E-mail: [npedersen@hanmor.com](mailto:npedersen@hanmor.com)

Attorneys for the **CITY OF LOS ANGELES  
DEPARTMENT OF WATER AND POWER**

Dated: November 30, 2006

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OF THE STATE OF CALIFORNIA**

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NOTICE OF EX PARTE COMMUNICATION**

In accordance with Rule 8.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Norman A. Pedersen respectfully submits this notice of an oral ex parte communication. On November 27, 2006 (3:00 p.m.), at the Commission’s San Francisco offices, Randy S. Howard, City of Los Angeles Department of Water and Power (“LADWP”), met with Commissioner Rachelle Chong, her Advisor, Andrew Campbell, and Lynn Carew. The communication was initiated by Norman Pedersen. Mr. Pedersen was also present during the communication. The communication lasted approximately thirty minutes.

Mr. Howard explained the potentially adverse consequence that adoption of the Southern California Gas Company “Firm Access Rights” (“FAR”) proposal in A.04-12-004 could have on LADWP. LADWP is striving to add renewable energy resources to, among other things, reduce greenhouse gas emissions. Many renewable energy resources are intermittent. Gas-fired generation is going to be required to back up the renewable resources. Mr. Howard explained that the FAR program that would be approved by the Proposed Decision and Alternate Proposed Decision would make reliance on gas-fired resources more costly and less reliable than under the existing gas market structure in southern California. Norman Pedersen presented a copy of the opening comments filed on November 20, 2006, by the Southern California Generation Coalition, of which LADWP is a member, and a letter addressed

to the Commissioners, dated November 20, 2006, signed by representatives of eleven southern California electric generators, including LADWP.

A copy of this Notice of Ex Parte Communication and attachments may be obtained by contacting Rosemarie McBride at [rmcbride@hanmor.com](mailto:rmcbride@hanmor.com).

Respectfully submitted,

*/s/ Norman A. Pedersen*

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Norman A. Pedersen  
HANNA AND MORTON LLP  
444 South Flower Street, Suite 1500  
Los Angeles, California 90071-2916  
Telephone: (213) 430-2510  
Facsimile: (213) 623-3379  
E-mail: [npedersen@hanmor.com](mailto:npedersen@hanmor.com)

Attorneys for the **CITY OF LOS ANGELES**  
**DEPARTMENT OF WATER AND POWER**

Dated: November 30, 2006

**ATTACHMENT A**

**SOUTHERN CALIFORNIA GENERATION COALITION  
OPENING COMMENTS FILED NOVEMBER 20, 2006**

**ATTACHMENT B**

**NOVEMBER 20, 2006 LETTER TO COMMISSIONERS  
FROM ELECTRIC GENERATORS**

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a copy of the **CITY OF LOS ANGELES DEPARTMENT OF WATER AND POWER NOTICE OF EX PARTE COMMUNICATION** on the service list established for A.04-12-004 by serving a copy to each party by electronic mail, or by mailing a properly addressed copy by first-class mail with postage prepaid to each party unable to accept service by electronic mail.

Executed on November 30, 2006, at Los Angeles, California.

*/s/ Rosemarie F. McBride*

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Rosemarie F. McBride

## A.04-12-004 E-MAIL SERVICE LIST

agc@cpuc.ca.gov  
ahartmann@lspower.com  
akornicks@kernoil.com  
alf@cpuc.ca.gov  
amsmith@semptra.com  
amsmith@semptra.com  
andy.bettwy@swgas.com  
anita.hart@swgas.com  
asteale@hanmor.com  
astein@whitecase.com  
asullivan@semptra.com  
bcragg@gmssr.com  
beg@cpuc.ca.gov  
bjeider@ci.burbank.ca.us  
bmusich@semptrautilities.com  
bruce.foster@sce.com  
burkee@cts.com  
bwood@energy.state.ca.us  
case.admin@sce.com  
cem@newsdata.com  
centralfiles@semptrautilities.com  
ceyap@earthlink.net  
chrishilen@dwt.com  
cpuccases@pge.com  
cpucrulings@navigantconsulting.com  
curtis.kebler@gs.com  
david\_white@transcanada.com  
davidjmiller@att.com  
dgilmore@semptra.com  
dhuard@manatt.com  
dil@cpuc.ca.gov  
dkk@eslawfirm.com  
douglas.porter@sce.com  
douglas.w.rasch@exxonmobil.com  
douglass@energyattorney.com  
dws@r-c-s-inc.com  
egw@a-klaw.com  
ek@a-klaw.com  
ek@a-klaw.com  
ekgrubaug@iid.com  
epoole@adplaw.com  
e-recipient@caiso.com  
filings@a-klaw.com  
FRL3@pge.com  
ghinners@reliant.com  
gloria.ing@sce.com  
glw@eslawfirm.com  
gpickering@navigantconsulting.com  
Henry.Nanjo@dgs.ca.gov  
henry.weissmann@mto.com  
jab@cpuc.ca.gov  
Jairman.gopal@sce.com  
jarmstrong@gmssr.com  
jdh@eslawfirm.com  
jkarp@winston.com

jleslie@luce.com  
jnm@cpuc.ca.gov  
Joe.paul@dynegy.com  
jpower@reliant.com  
jsanders@caiso.com  
jsw@cpuc.ca.gov  
karen@klindh.com  
kcl@cpuc.ca.gov  
Kelly.Allen@crosscountryenergy.com  
kglick@energy.state.ca.us  
kjbh@pge.com  
klatt@energyattorney.com  
kmccrea@sablau.com  
kowalewskia@calpine.com  
kts1@pge.com  
kts1@pge.com  
lcr0@pge.com  
liddell@energyattorney.com  
ltc@cpuc.ca.gov  
marcel@turn.org  
matt@bradylawus.com  
mday@gmssr.com  
mdp5@pge.com  
mflorio@turn.org  
Michael.Alexander@sce.com  
mlgillette@duke-energy.com  
mmilner@coral-energy.com  
mrw@mrwassoc.com  
mzafar@semprautilities.com  
Ned.Greenwood@questar.com  
npedersen@hanmor.com  
nwhang@manatt.com  
nwhang@manatt.com  
ofoote@hkcf-law.com  
patrickm@crossborderenergy.com  
pesposito@cbcatalysts.com  
placourciere@thelenreid.com  
pzs@cpuc.ca.gov  
qli@aspenerg.com  
ralph.dennis@constellation.com  
ram@cpuc.ca.gov  
ramage@pwlng.com  
randy.gabe@swgas.com  
raza.lawrence@mto.com  
rkeen@manatt.com  
rmp@cpuc.ca.gov  
Robert.Foss@PPMEnergy.com  
robert.pettinato@ladwp.com  
roger.pelote@williams.com  
rxr@cpuc.ca.gov  
sdhilton@stoel.com  
sendo@ci.pasadena.ca.us  
slins@ci.glendale.ca.us  
sls@a-klaw.com  
snelson@sempra.com  
steve.koerner@el Paso.com  
thaddeus\_thomson@oxy.com  
tomb@crossborderenergy.com



walker.matthews@sce.com  
wbooth@booth-law.com  
wrapp@sempra.com  
wtobin@sempraglobal.com  
ygross@sempraglobal.com